

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

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SCOTT TURNAGE , CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN, and KIMBERLY ALLEN on  
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

v.

BILL OLDHAM, in his individual capacity as former  
Sheriff of Shelby County, Tennessee; FLOYD  
BONNER, JR., in his official capacity as Sheriff of  
Shelby County, Tennessee; ROBERT MOORE, in his  
individual capacity as former Jail Director of Shelby  
County, Tennessee; KIRK FIELDS, in his official  
capacity as Jail Director of Shelby County, Tennessee;  
CHARLENE MCGHEE, in her individual capacity as  
former Assistant Chief of Jail Security of Shelby County,  
Tennessee; REGINALD HUBBARD, in his official  
capacity as Assistant Chief of Jail Security of Shelby  
County, Tennessee; DEBRA HAMMONS, in her  
individual capacity as former Assistant Chief of Jail  
Programs of Shelby County, Tennessee; TIFFANY  
WARD in her official capacity as Assistant Chief of Jail  
Programs of Shelby County, Tennessee; SHELBY  
COUNTY, TENNESSEE, a Tennessee municipality;  
TYLER TECHNOLOGIES, INC., a foreign corporation;  
GLOBAL TEL\*LINK CORPORATION, a foreign  
corporation; SOFTWARE AG USA, INC., a foreign  
corporation; and SIERRA-CEDAR, INC., a foreign  
corporation, SIERRA SYSTEMS GROUP, INC., a  
foreign corporation.

DEFENDANTS.

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**Case No. 2:16-cv-2907-  
SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY, AND  
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

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**AMENDED NOTICE TO TAKE THE DEPOSITION OF PAUL ZIEGLER**

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To: Paul Ziegler  
c/o Bradley E. Trammell, Esq.  
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-and-

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Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Shawna Webb, individually, via teleconference<sup>1</sup>, commencing on **Wednesday, August 19, at 9:00 a.m.**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter with Huseby Court Reporting, through their teleconference platform,

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<sup>1</sup> "Teleconference" is defined to mean any means of taking the deposition that utilizes telecommunications technology including, but not limited to, telephone, videoconference, Voice Over Internet Protocol audio. The specific details of the method shall be provided either by the attorney noticing this deposition or by the entity providing the teleconference service. The method of taking the deposition shall govern the manner in which exhibits shall be presented to the deponent, but the deponent should be prepared to have access to a computer with a high-speed internet connection, video capability, Adobe Flash, and a Google Chrome browser. As of the date of this Notice, the attorney giving notice of the deposition intends to utilize Huseby Connect or Zoom as the specific mechanism to take the deposition. In the event that this is not feasible for the deponent, deponent should contact the attorney giving notice of this deposition as soon as practicable to make alternative arrangements.

*Huseby Connect*, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means. A representative from Huseby Court Reporting will contact all attorneys that are parties to this action in order to set up a “test run” of the Huseby Connect platform prior to the date of the deposition.

Respectfully submitted,

/s/ Brice M. Timmons

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Brice M. Timmons (#29582)

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 24<sup>th</sup> day of June, 2020, for service on all persons registered in connection with this case, including:

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